

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AC2T, Inc., d/b/a Spartan Mosquito,	:	
Plaintiff,	:	Civil Action
v.	:	Case Number: 2:19-cv-05946-RBS
Colin Purrington,	:	Jury Trial Demanded
Defendant.	:	
	:	

**MEMORANDUM OF LAW IN SUPPORT OF
MOTION OF COUNSEL FOR PLAINTIFF AC2T, INC.,
D/B/A SPARTAN MOSQUITO FOR LEAVE TO WITHDRAW**

Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. should be permitted to withdraw from representing Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in the above captioned case.

The Rules of Professional Conduct set forth the grounds and procedures for terminating representation of a client:

Rule 1.16 Declining or Terminating Representation.

- (1) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if;
- (2) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- (3) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or
- (4) other good cause for withdrawal exists.

Plaintiff Spartan Mosquito has failed to fulfill obligations to Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law regarding legal services in this matter and have been given

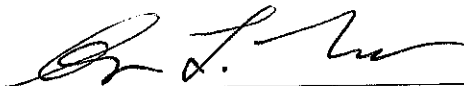
reasonable warning that Alan L. Frank, Esquire, Evan L. Frank Esquire and ALF Law will seek to withdraw as counsel unless the obligations are fulfilled.

Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law have provided certain services on the client's behalf pursuant to the terms of a Retainer Agreement in this matter without receiving payment for said services.

Alan L. Frank, Esquire, Evan L. Frank and ALF Law communicated by telephone and mail on multiple occasions with client Spartan Mosquito concerning the aforesaid obligations.

For the foregoing reasons, Alan L. Frank, Esquire, Evan L. Frank, Esquire, and Alan L. Frank Law Associates, P.C. respectfully requests that this Honorable Court grant the request to withdraw its appearance on behalf of Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in all further proceedings in this matter.

ALAN L. FRANK LAW ASSOCIATES, P.C.



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Dated: January 30, 2024